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VL: USAO 2025R00052

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

v.

**ANDREW JOSEPH STILLING, JR.,
Defendant.**

CRIMINAL NO.

2DB25cr33

(Sexual Exploitation of a Child, 18 U.S.C. § 2251(a); Distribution of Child Pornography, 18 U.S.C. § 2252(a)(2); Receipt of Child Pornography, 18 U.S.C. § 2252A(a)(2); Possession of Child Pornography, 18 U.S.C. § 2252A(a)(5)(B); Forfeiture, 18 U.S.C. § 2253, 21 U.S.C. § 853(p), 28 U.S.C. § 2461(c))

INDICTMENT

COUNT ONE

(Sexual Exploitation of a Child)

The Grand Jury for the District of Maryland charges that:

On or about November 30, 2024, in the District of Maryland, and elsewhere, the defendant,

ANDREW JOSEPH STILLING, JR.,

did knowingly attempt to and did knowingly employ, use, persuade, induce, entice and coerce a minor female, Minor Victim 1, to engage in sexually explicit conduct as defined in Title 18, United States Code, Section 2256(2), for the purpose of producing visual depictions of such conduct, knowing and having reason to know that such a visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce, such visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and such visual depictions have actually been transported and transmitted using any means and facility of interstate and foreign commerce, that is, a video that depicts Minor Victim 1 naked with her genitals exposed, said video file having been stored on an iPhone 8, Serial Number FFMVP6NYJC6C, with IMEI 356705087149864, manufactured and assembled in China.

18 U.S.C. § 2251(a)

COUNT TWO

(Distribution of Child Pornography)

The Grand Jury for the District of Maryland further charges that:

On or about November 30, 2024, in the District of Maryland, and elsewhere, the defendant,

ANDREW JOSEPH STILLING, JR.,

did knowingly distribute any visual depiction using any means and facility of interstate and foreign commerce, and that had been mailed, shipped and transported in and affecting interstate and foreign commerce, and which contained materials which had been so mailed, shipped and transported, by any means including by computer, and knowingly reproduced any visual depiction for distribution using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce and through the mails, the production of which involved the use of a minor engaged in sexually explicit conduct and such depiction being of such conduct, that is, **STILLING** used his internet-based messaging/Kik account to distribute visual depictions of Minor Victim 1 engaged in sexually explicit conduct to another Kik user.

18 U.S.C. § 2252(a)(2)

COUNT THREE

(Distribution of Child Pornography)

The Grand Jury for the District of Maryland further charges that:

On or about December 1, 2024, in the District of Maryland, and elsewhere, the defendant,

ANDREW JOSEPH STILLING, JR.,

did knowingly distribute any visual depiction using any means and facility of interstate and foreign commerce, and that had been mailed, shipped and transported in and affecting interstate and foreign commerce, and which contained materials which had been so mailed, shipped and transported, by any means including by computer, and knowingly reproduced any visual depiction for distribution using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce and through the mails, the production of which involved the use of a minor engaged in sexually explicit conduct and such depiction being of such conduct, that is, **STILLING** used his internet-based messaging/Kik account to distribute visual depictions of Minor Victim 1 engaged in sexually explicit conduct to another Kik user.

18 U.S.C. § 2252(a)(2)

COUNT FOUR

(Receipt of Child Pornography)

The Grand Jury for the District of Maryland further charges that:

On or about September 22, 2024, in the District of Maryland, and elsewhere, the defendant,

ANDREW JOSEPH STILLING, JR.,

did knowingly receive child pornography and materials that contain child pornography, as defined in Title 18, United States Code, Section 2256(8), that had been mailed, shipped and transported in interstate and foreign commerce by any means, including by computer, that is, **STILLING** used an online account to receive a visual depiction of a prepubescent minor engaged in sexually explicit conduct.

18 U.S.C. §§ 2252A(a)(2)

COUNT FIVE
(Possession of Child Pornography)

The Grand Jury for the District of Maryland further charges that:

On or about December 6, 2024, in the District of Maryland, and elsewhere, the defendant,

ANDREW JOSEPH STILLING, JR.,

did knowingly possess any material that contained an image of child pornography, as defined in Title 18, United States Code, Section 2256(8), which image had been shipped and transported using any means and facility of interstate and foreign commerce and in and effecting interstate and foreign commerce by any means, including by computer, and that was produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, that is, the defendant did possess an iPhone 8, Serial Number FFMVP6NYJC6C, with IMEI 356705087149864, containing one or more visual depictions of minors, including at least one prepubescent minor, engaged in sexually explicit conduct.

18 U.S.C. §§ 2252A(a)(5)(B) & 2256

FORFEITURE ALLEGATION

The Grand Jury for the District of Maryland further finds that:

1. Pursuant to Fed. R. of Crim. P. 32.2, notice is hereby given to the defendant that the United States will seek forfeiture as part of any sentence in accordance with 18 U.S.C. § 2253, 21 U.S.C. § 853(p), and 28 U.S.C. § 2461(c), as a result of the defendant's conviction under any of the offenses set forth in Counts One through Five of this Indictment.

Sexual Exploitation of Children and Distribution, Receipt, and Possession of Child Pornography Forfeiture

2. Upon conviction of any of the offenses set forth in Counts One through Five of this Indictment, the defendant,

ANDREW JOSEPH STILLING, JR.,

shall forfeit to the United States, pursuant to 18 U.S.C. § 2253(a):

a. any visual depiction described in Title 18, United States Code, Sections 2251, 2251A, 2252, or 2252A, 2252B, or 2260 or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, received or possessed in violation of Title 18, United States Code, Chapter 110;

b. any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense(s); and

c. any property, real or personal, used or intended to be used to commit or to promote the commission of such offense(s) or any property traceable to such property.

Property Subject to Forfeiture

3. The property to be forfeited includes, but is not limited to, the following: an iPhone 8, Serial Number FFMVP6NYJC6C.


Substitute Assets

4. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property that cannot be subdivided without difficulty;

the United States shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 2253(b) and 28 U.S.C. § 2461(c).

18 U.S.C. § 2253
21 U.S.C. § 853(p)
28 U.S.C. § 2461(c)


Phillip A. Selden
Acting United States Attorney

SIGNATURE REDACTED

foreperson

Date: February 19, 2025